

# EXHIBIT A

**Teresa Zukoski**

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**From:** Christopher Betke <[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)>  
**Sent:** Monday, August 21, 2023 9:20 AM  
**To:** Steve Schwarz  
**Cc:** Jaclyn Wanemaker; Benjamin Levites; Teagan C. Dolan  
**Subject:** RE: [External] Marcellin v HP

**Categories:** Attached to SA

[EXTERNAL: This email originated from outside of the organization.]

Steve: We wish to meet and confer about your inadequate discovery responses. Best, Chris

**CHRISTOPHER G. BETKE**

**PARTNER**

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[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)

**COUGHLIN•BETKE LLP**

Massachusetts | Connecticut | New Hampshire | New York | Rhode Island

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**From:** Steve Schwarz <[sschwarz@faraci.com](mailto:sschwarz@faraci.com)>  
**Sent:** Monday, August 21, 2023 9:07 AM  
**To:** Christopher Betke <[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)>  
**Cc:** Jaclyn Wanemaker <[jwanemaker@smithsovik.com](mailto:jwanemaker@smithsovik.com)>; Benjamin Levites <[blevites@coughlinbetke.com](mailto:blevites@coughlinbetke.com)>; Teagan C. Dolan <[tdolan@faraci.com](mailto:tdolan@faraci.com)>  
**Subject:** RE: [External] Marcellin v HP

This request was only to alert us to the reason for the meet and confer. You had identified what you believed were deficiencies in Plaintiffs' responses back in April and we served amended responses. You have not mentioned anything since.

We filed the motion to compel after you had agreed to respond by June 30 in a prior meet and confer, an agreement that was actually contained in the letter to the judge asking for an extension. We did not see much utility in another meet and confer after we did not receive any responses to the RFP on June 30 or thereafter until after we filed our motion to compel. When you contacted me after you finally did respond, I sent you a detailed email specifying what we viewed as the deficiencies in your belated responses. You have not responded to that email.

Your email did not indicate what you wanted to meet and confer about. In my experience, that is always a good thing to know if you are serious on wanting to try to resolve a dispute.

**Faraci Lange**  
ATTORNEYS

**Stephen G. Schwarz, Esq.**  
*Managing Partner*

**WE'VE MOVED!**

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**From:** Christopher Betke <[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)>  
**Sent:** Monday, August 21, 2023 8:55 AM  
**To:** Steve Schwarz <[sschwarz@faraci.com](mailto:sschwarz@faraci.com)>  
**Cc:** Jaclyn Wanemaker <[jwanemaker@smithsovik.com](mailto:jwanemaker@smithsovik.com)>; Benjamin Levites <[blevites@coughlinbetke.com](mailto:blevites@coughlinbetke.com)>  
**Subject:** RE: [External] Marcellin v HP

[EXTERNAL: This email originated from outside of the organization.]

Hi Steve: You know the local rules better than me. Would you be kind enough to direct me to a rule that requires us to provide you a writing in advance of any meet and confer? Or are you requesting a courtesy that you did not extend to us? Let me know. Thanks. Best, Chris PS I hope you are having a nice vacation

**CHRISTOPHER G. BETKE**

**PARTNER**

**DIRECT DIAL: (617)988-8047**

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**From:** Steve Schwarz <[sschwarz@faraci.com](mailto:sschwarz@faraci.com)>  
**Sent:** Monday, August 21, 2023 8:47 AM  
**To:** Christopher Betke <[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)>  
**Cc:** Jaclyn Wanemaker <[jwanemaker@smithsovik.com](mailto:jwanemaker@smithsovik.com)>; Benjamin Levites <[blevites@coughlinbetke.com](mailto:blevites@coughlinbetke.com)>  
**Subject:** RE: Marcellin v HP

I'm on vacation this week. Let me know what works for you next week. If you are contending that there are any deficiencies in our discovery demands, please provide them in writing in advance of any meet and confer.

Thank you.



Stephen G. Schwarz, Esq.  
Managing Partner

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**From:** Christopher Betke <[cbetke@coughlinbetke.com](mailto:cbetke@coughlinbetke.com)>

**Sent:** Friday, August 18, 2023 7:37 PM

**To:** Steve Schwarz <[sschwarz@faraci.com](mailto:sschwarz@faraci.com)>

**Cc:** Jaclyn Wanemaker <[jwanemaker@smithsovik.com](mailto:jwanemaker@smithsovik.com)>; Benjamin Levites <[blevites@coughlinbetke.com](mailto:blevites@coughlinbetke.com)>

**Subject:** [External] Marcellin v HP

[EXTERNAL: This email originated from outside of the organization.]

Hi Steve : please let us know your availability this Tuesday after 10 am for a meet and confer in connection with plaintiff's discovery responses. We intend to comply with the local rule before serving any motion. Let us know when is good for you on Tuesday. Thanks much.

Best, Chris

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